

EXHIBIT O

From: [Arjun Vasan](#)
To: [Keech, Ryan Q.](#)
Cc: [Chiu, Stacey G.](#); [Makitalo, Rebecca I.](#); [Winningham, Jacob R.](#)
Subject: Re: Arjun Vasan v. Checkmate.com, Inc. - 2:25-00765-MEMF-JPR - September 18 Orders
Date: Saturday, September 20, 2025 9:38:09 PM

This Message Is From an External Sender

This message came from outside your organization.

If you continue to harass my father, I guarantee your callous email, to a 70 year old man with a serious health condition, will result in sanctions against you. He has no obligation to provide any information to you, but rest assured you are treading on dangerous water.

He has not testified in the C.D. Cal. case. He has nothing to say in this case. I have not listed him as a witness in this case. Your counterclaims will be dismissed because the contracts are facially invalid under California law, and your fraud claims are exclusively built on contract clauses.

Your assertion that he is essential to my "claims and defenses" is false. Back off. Now.

Best regards,
Arjun Vasan

On Fri, Sep 19, 2025 at 5:37 PM Arjun Vasan <arjun.vasan@gmail.com> wrote:

Mr. keech,

I saw your message to my father. Any reasonable person would characterize it that way. Your over the top tactics will come back to bite you.

Best

Sent from Gmail Mobile

On Fri, Sep 19, 2025 at 5:24 PM Arjun Vasan <arjun.vasan@gmail.com> wrote:

I said that i would also agree that any checkmate personnel I deposed could testify remotely. That is the opposite of prejudicial, and indeed is also beneficial to your client. Its humane and fair.

Sent from Gmail Mobile

On Fri, Sep 19, 2025 at 5:19 PM Arjun Vasan <arjun.vasan@gmail.com> wrote:

Explain how it is "prejudicial?". And yes i have a basis. In response to my father's notifying you of health problems, you asserted that as a reason to hurry his deposition. That is incredibly gross and unprofessional, and contrary to rule 45.

Sent from Gmail Mobile

On Fri, Sep 19, 2025 at 5:16 PM Keech, Ryan Q. <Ryan.Keech@klgates.com> wrote:

Mr. Vasan,

You have absolutely no legitimate basis for the characterization you make below. We note that you have made your prejudicial demand for remote-only proceedings before, which Checkmate rejected then and continues to reject now.

Best regards,

Ryan



Ryan Q. Keech

Partner

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From: Arjun Vasan <arjun.vasan@gmail.com>

Sent: Friday, September 19, 2025 4:58 PM

To: Keech, Ryan Q. <Ryan.Keech@klgates.com>

Cc: Chiu, Stacey G. <Stacey.Chiu@klgates.com>; Makitalo, Rebecca I.

<Rebecca.Makitalo@klgates.com>; Winningham, Jacob R.

<Jacob.Winningham@klgates.com>

Subject: Re: Arjun Vasani v. Checkmate.com, Inc. - 2:25-00765-MEMF-JPR - September 18
Orders

Counsel,

I suggest we agree mutually to restrict any depositions to remote testimony to minimize burden on all involved as per Rule 45 (which expressly requires minimizing non party burden).

Your rude messages to my father are uncalled for, and indeed unprofessional and unacceptable.

Best,

Arjun Vasani

Sent from Gmail Mobile

On Fri, Sep 19, 2025 at 10:44 AM Arjun Vasani <arjun.vasani@gmail.com> wrote:

Given Checkmate's untimely oppositions, filed without leave (and which I will ask the Court to disregard or strike) I will be occupied until Friday, September 26. Please propose a time on that day. If you do not agree to discuss both parties' issues, I will note in any relevant filing that *Checkmate* has refused to meet and discuss my concerns, and reserve the right to proceed to motion practice to resolve them.

Best regards,

Arjun Vasani

On Thu, Sep 18, 2025 at 5:34 PM Keech, Ryan Q. <Ryan.Keech@klgates.com> wrote:

Mr. Vasan,

Checkmate rejects your groundless and self-serving misinterpretation of the record, rejects further your baseless demand to revisit the Court's existing order rejecting your attempt to require the withdrawal of relevant discovery that you apparently do not find to be convenient, and again notes your refusal to meet and confer.

We urge you again to conduct yourself professionally and provide the availability requested in previous correspondence, and otherwise will continue to work with the relevant parties to ensure prompt compliance.

Best regards,

Ryan



Ryan Q. Keech

Partner

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D.C.*

From: Arjun Vasani <arjun.vasani@gmail.com>
Sent: Thursday, September 18, 2025 12:59 PM
To: Chiu, Stacey G. <Stacey.Chiu@klgates.com>; Keech, Ryan Q. <Ryan.Keech@klgates.com>; Makitalo, Rebecca I. <Rebecca.Makitalo@klgates.com>; Winningham, Jacob R. <Jacob.Winningham@klgates.com>
Subject: Arjun Vasani v. Checkmate.com, Inc. - 2:25-00765-MEMF-JPR - September 18 Orders

Counsel,

While Judge Frimpong has not explicitly ruled on your request for leave to file late oppositions, her decision to take the motions under submission without granting such leave signals that the Court is proceeding based on the current briefing. In light of this, discovery demands premised on unresolved counterclaims are, at this stage, unduly burdensome and premature.

Accordingly, I decline to participate in a one-sided meet-and-confer focused solely on my witness disclosures, which relate only to your counterclaims. I remain willing to engage in a comprehensive and mutually respectful discussion of all outstanding discovery issues, provided the meeting is recorded by mutual agreement.

Please confirm if you are open to a consolidated and recorded meet-and-confer. If not, I will treat this issue as preserved for judicial resolution. I further expect you will withdraw or hold in abeyance the subpoenas to Robert Nessler and Vasani Varadarajan, and inform these witnesses of such action.

Best regards,

Arjun Vasani

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